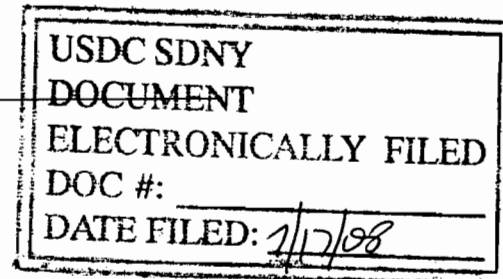
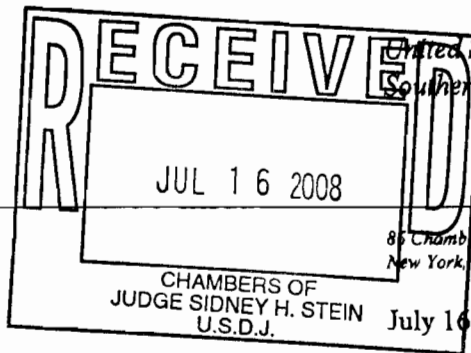


U.S. Department of Justice



By Facsimile
Hon. Sidney H. Stein
United States District Judge
United States Courthouse
500 Pearl Street, Room 1010
New York, NY 10007

MEMO ENDORSED

Re: U.S.A. v. Wright et al., 07 Civ. 4651 (SHS)

Dear Judge Stein:

I respectfully write on behalf of all of the parties in the above-referenced matter to request that defendant William Wright ("Wright") be permitted to close on a contract for the sale of his cooperative apartment on or before July 31, 2008, notwithstanding the judgment entered on July 14, 2008, in this matter.

By way of background, the Court yesterday entered judgement (1) in the amount of \$401,608.62 with respect to Wright's federal tax liabilities for the tax years 1996 through 2005; (2) foreclosing the tax liens on Wright's interest in his cooperative apartment; and (3) decreeing that the federal tax liens shall be foreclosed by a sale of the subject apartment, upon a post-judgment motion for an order of sale to be filed by the United States.

Unbeknownst to the United States until relatively recently, Wright has independently pursued a private sale of his apartment to Mr. Alberto Corvo at market value and appears to be in a position to schedule a closing by the end of the month. The parties to this action would like to give Wright the opportunity to complete that transaction, which, if completed promptly, would be in everyone's interest. The purchase price of \$735,000.00 is enough to satisfy all known liens on the apartment,¹ including the federal tax liens of the United States through the 2006 tax year, and the claims of 310 West 56th Street Corporation and still leave a balance of approximately \$80,000.00, a fact which should be confirmed in the Department of Housing and Urban Development Form 1, the so-called "HUD-1" form, which is required by federal statute to be filed for every real estate transaction.

¹ In addition to the federal tax liens, the only known liens on the apartment relate to the following debt: the mortgage on the cooperative apartment, New York State and New York City income taxes, and the balance on an American Express credit card. According to the recent payoff letters Wright forwarded to the undersigned, the aforementioned debt totals approximately \$217,000.00.

Hon. Sydney H. Stein

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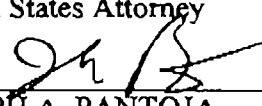
Accordingly, the parties respectfully request that, notwithstanding the judgment in this matter, dated July 14, 2008, Wright be permitted to sell his cooperative apartment for \$735,000.00 by July 31, 2008, pursuant to the March 2008 contract between Wright and Mr. Corvo, provided that Wright serves upon the undersigned by facsimile at least 24 hours prior to the closing a HUD-1 Form that confirms that payments will be made at the closing in amounts sufficient to satisfy all known lien holders.

Thank you for your consideration.

Respectfully,

MICHAEL J. GARCIA
United States Attorney

By:


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7/17/08
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